

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA :

v. :

ALANDA BRAXTON :

Defendant. :

NO. 1:08-CR- 273

(Judge Caldwell)

INDICTMENT

THE GRAND JURY CHARGES THAT:

A. INTRODUCTION

1. In February 2007, the defendant, **ALANDA BRAXTON**, a resident of Baltimore, Maryland, obtained a NetSpend prepaid credit card at ACE in Baltimore, Maryland.

2. NetSpend Corporation is located in Austin, Texas.

3. The original balance on the NetSpend prepaid credit card was \$30.00.

4. Between February 2007 and May 2008, the defendant, **ALANDA BRAXTON**, made numerous purchases, primarily Home Depot gift cards, using the NetSpend prepaid credit card.

5. The purchases were made in the Eastern, Middle and Western Districts of Pennsylvania, the District of Maryland, the Eastern District of Virginia and elsewhere.

FILED
HARRISBURG, PA
JUL 2 - 2008

MARY E. D'AMICO
Per Deputy Clerk

6. However, as the defendant, **ALANDA BRAXTON**, well knew, the NetSpend prepaid credit card had no funds in the account to cover the purchases.

7. **ALANDA BRAXTON**, would then sell the Home Depot credit cards.

8. The total amount for purchases made on the NetSpend prepaid credit card is \$398,449.84.

9. The total amount of payments/deposits on the NetSpend prepaid credit card were \$850.00.

COUNTS I THROUGH IV
(Wire Fraud)

The Grand Jury hereby incorporates by reference, as though fully set forth herein, each of the allegations set forth in the Introduction portion of this Indictment.

B. PURPOSE OF THE SCHEME AND ARTIFICE

From on or about March 2007, continuing up to on or about April 8, 2008, the defendant, **ALANDA BRAXTON**, devised a scheme and artifice for obtaining Home Depot gift cards and property by means of false and fraudulent pretenses, representations and promises.

C. THE SCHEME AND ARTIFICE.

1. It was part of the scheme and artifice that the defendant, **ALANDA BRAXTON**, on or about February 2007, obtained a NetSpend prepaid credit card in order to make purchases using the credit card.

2. It was further a part of the scheme and artifice that the defendant, **ALANDA BRAXTON**, would travel to stores and businesses, primarily Home Depot stores, in the Eastern, Middle and Western Districts of Pennsylvania, the District of Maryland, the Eastern District of Virginia and elsewhere and make purchases with the NetSpend prepaid credit card knowing that the NetSpend prepaid credit card had no funds in the account to cover the purchases.

3. Between on or about February 2007 and on or about May 2008, the defendant, **ALANDA BRAXTON**, made purchases with the NetSpend prepaid credit card in the amount of \$398,449.84.

D. THE WIRE COMMUNICATIONS.

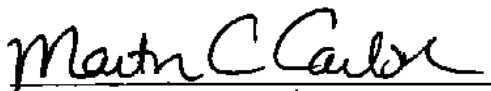
From on or about February 2007, up to on or about May 2008, the defendant, **ALANDA BRAXTON**, for the purpose of executing the scheme and artifice, did transmit and cause to be transmitted in interstate commerce, by means

of a wire communication, certain signs, signals and sounds, as follows:

COUNT	DATE	ORIGIN	DESTINATION	DESCRIPTION	FRAUD AMOUNT
1	on or about 12/20/07	Home Depot Store# 4138 Harrisburg, PA	NetSpend Austin, TX	Use of NetSpend credit card to purchase a Home Depot Gift Card	\$6,691.22
2	on or about 12/20/07	Home Depot Store# 4149 Carlisle, PA	NetSpend Austin, TX	Use of NetSpend credit card to purchase a Home Depot Gift Card	\$2,157.92
3	on or about 12/20/07	Home Depot Store# 4113 Harrisburg, PA	NetSpend Austin, TX	Use of NetSpend credit card to purchase property	\$8.69
4	on or about 12/20/07	Home Depot Store# 4113 Harrisburg, PA	NetSpend Austin, TX	Use of NetSpend credit card to purchase a Home Depot Gift Card	\$4,205

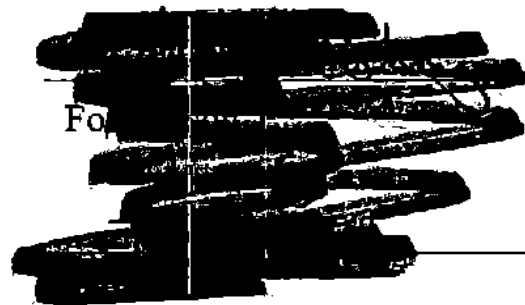
All in violation of Title 18, United States Code, Section 1343.

A TRUE BILL



MARTIN C. CARLSON

United States Attorney


For